

Personal Data Protection Policy

[Version 1.1]

Purple[®] Group

1. Purpose

This Personal Data Protection Policy (the “Policy”) outlines the principles and guidelines that Purple Group and its affiliated entities (referred to as the “Company”) follows for the collection, processing, and protection of personal data in compliance with the Personal Data Protection Act 2010 (PDPA) in Malaysia. This Policy applies to all employees, contractors, and third parties who handle personal data on behalf of the Company.

2. Definitions

- **Personal Data:** Refers to any information relating to an identified or identifiable individual.
- **Data Subject:** An individual to whom the personal data relates.
- **Data Controller:** The entity that determines the purposes and means of processing personal data.
- **Data Processor:** An entity that processes personal data on behalf of the Data Controller.
- **Consent:** The voluntary agreement provided by the Data Subject for the collection, processing, and use of their personal data.

3. Data Collection and Consent

- The Company shall obtain consent from Data Subjects before collecting their personal data, except where permitted by law.
- Consent shall be obtained in a clear and transparent manner, explaining the purposes for which the personal data will be used.

- Data Subjects have the right to withdraw their consent at any time, subject to legal and contractual restrictions.

4. Data Accuracy and Retention

- The Company shall ensure that personal data collected is accurate, complete, and up-to-date.
- Personal data shall be retained for the duration necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations.
- The Company shall establish procedures for the secure disposal of personal data that is no longer necessary.

5. Data Security

- The Company shall implement appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, or destruction.
- Access to personal data shall be limited to authorized individuals who require it for legitimate business purposes.
- The Company shall regularly review and update its security measures to address emerging threats and maintain the confidentiality and integrity of personal data.

6. Individual Rights

- Data Subjects have the right to access their personal data held by the

Company and request correction of any inaccuracies.

- The Company shall respond to data access and correction requests promptly, subject to legal and contractual obligations.
- Data Subjects may also exercise their rights to request the deletion or restriction of processing of their personal data, in accordance with applicable laws and regulations.

7. Data Transfers

- The Company shall ensure that any cross-border transfer of personal data complies with the requirements of the PDPA.
- Such transfers shall be made to countries or organizations that provide an adequate level of data protection or with appropriate safeguards in place, including the use of standard contractual clauses or other approved mechanisms.

8. Data Breach Response

- The Company shall establish procedures to detect, assess, and respond to personal data breaches promptly.
- In the event of a data breach, the Company shall notify affected Data Subjects and the relevant authorities in accordance with applicable laws and regulations.
- Remedial actions shall be taken to mitigate the impact of the breach and prevent future occurrences.

9. Employee Training and Awareness

- The Company shall provide regular training to employees, contractors, and relevant third parties on data protection principles, the PDPA, and the Company's policies and procedures.
- Employees shall be made aware of their responsibilities regarding the handling of personal data and the importance of maintaining confidentiality and privacy.

10. Compliance and Consequences

- Non-compliance with this Policy and the PDPA may result in disciplinary actions, up to and including termination of employment or contractual relationship.
- The Company shall regularly review and update this Policy to ensure its continued compliance with applicable laws and regulations.